

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

DOCKET NO. N2011-1

INTERROGATORY OF DAVID B. POPKIN TO THE UNITED STATES POSTAL  
SERVICE [DBP/USPS-62]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatory pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

August 30, 2011

Respectfully submitted,

N20111J62

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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DBP/USPS-62 On August 19, 2011, the Postal Service filed its NOTICE OF THE UNITED STATES POSTAL SERVICE which appears to serve the purpose of establishing Library Reference USPS-LR-N2011-1/4 which appears to be the public version of Library Reference USPS-LR-N2011-1/NP1.

This filing consisted of nine separate PDF computer files. The Commission's website does not show a Library Reference 4 apparently because there does not appear to be a Library Reference 4 other than the statement in the last sentence of the Notice.

Obviously, I do not have access to the non-public document which is referenced to as being replaced. There are a total of 3459 pages. Since there are no real headings on the various documents, I will reference them by the order that they appear in the Commission's Daily Listing and the number of pages contained in the document.

[a] Please refer to Document #2 containing 4 pages.

[1] Please explain in detail the purpose of this document.

[2] What is the significance of the second word of the document ERRORS=0 and the word RE-WORK on the second line of the document?

[3] Please advise what categories or information, if any, were redacted in the public document.

[b] Please refer to Document #3 containing 1301 pages

[1] Please explain in detail the purpose of this document.

[2] What is the last column heading that is obscured by the PRC acceptance notation?

[3] On what basis are the individual offices sorted in the printout?

[4] Please provide the City and State for each of the entries.

[5] Please advise what categories or information, if any, were redacted in the public document.

[c] Please refer to Document #4 containing 428 pages

[1] Please explain in detail the purpose of this document.

[2] On what basis are the individual offices sorted in the printout?

[3] What does the PFC column show? Please provide a listing of all of the codes.

[4] What data is provided by each of the three Reporting Technologies shown in this document?

[5] The public document appears to have combined three columns from the non-public document into a single column with an entry of Retail – Walk-In Revenue. Please confirm or explain.

[6] It would appear that the non-public document contains actual dollar amounts in place of the entry Retail – Walk-In Revenue entry. Please confirm or explain.

[7] What type of data or information is provided in the AIC Revenue Code column?

[8] What type of data or information is provided in the Metrics column?

[9] What type of data or information is provided in the Final Amount column?

[10] Please provide the City and State for each of the entries.

[11] Please advise what categories or information, if any, were redacted in the public document.

[d] Please refer to Document #5 containing 575 pages

[1] Please explain in detail the purpose of this document.

[2] On what basis are the individual offices sorted in the printout?

[3] What is the significance of the entry and summary #NUM! that appears seven times on page 1?

[4] It would appear that this document consists of a cover sheet and two separate 287 page listings where PDF page 2 matches PDF page 289 so that the entries on one page must be connected with those appearing on the corresponding page 287 pages later. Please confirm or explain.

[5] Please provide a document that combines all of the entries for a given facility on the same page/line.

[6] Please provide the City and State for each of the entries.

[7] Page 1 indicates that a subset of CPUs is utilized. Please indicate the types of CPUs that are included as a Postal Location and those types that are not included in the subset.

[8] Please provide the rationale for including or not including a CPU in the subset that is considered as a Postal Location.

[9] Are the distances shown in the document airline distances or driving distances?

[10] If they are airline distances, please provide a similar listing showing driving distances.

[11] What do the PFC and PFC\_NAME columns show?

[12] It would appear that the entry Retail – Walk-In Revenue entry in the public document is replaced in the non-public document by the actual dollar amount that is for the given facility as opposed to the revenue of the nearest neighbor. Please confirm or explain.

[13] What is the significance of expressing the distance to the nearest neighbor to eight decimals or to the nearest one hundred-millionth of a mile which is equivalent to less than seven ten-thousandths of an inch?

[14] Please advise what categories or information, if any, were redacted in the public document.

[e] Please refer to Document #6 containing 575 pages

[1] Please explain in detail the purpose of this document.

[2] It appears that Document #6 is identical to Document #5 except that the entry and summary #NUM! that appears seven times on page 1 have been replaced by actual numerical entries. Please confirm.

[3] If you are unable to confirm subpart [e][2], please provide the responses to those requested in the fourteen subparts of subpart [d] above as they also relate to Document #6.

[f] Please refer to Document #7 containing 569 pages

[1] Please explain in detail the purpose of this document.

[2] On what basis are the individual paths sorted in the printout?

[3] It appears that the entries in the DIST\_TO\_NEAREST\_NEIGHBOR utilize the same data appearing in the last columns of Documents #5 and #6. Please confirm or explain.

[4] What data is contained in the last column POS\_IS\_LT100K?

[5] It appears that a Y in the last column indicates YES and no entry indicates a no. Please confirm or explain.

[6] Are the distances shown in the document airline distances or driving distances?

[7] If they are airline distances, please provide a similar listing showing driving distances.

[8] Since it appears that the finance numbers have been redacted and therefore there is no indication of the identity of the path. Please provide a similar document showing the facility name, city, and state for each end of the path.

[9] Please advise what categories or information, if any, were redacted in the public document.

[g] Please refer to Document #8 containing 1 page.

[1] Please explain in detail the purpose of this document.

[2] Are all Contract Postal Units included in the "retail locations" in this document? If yes, please explain the data shown in Documents #5 and #6. If no, please correct Document #8.

[3] The last line of the document [other than the Source] appears to indicate that there are 16,312 total locations in this criterion and that 13,494 of them have latitude/longitude data and that 2,818 [16,312 less 13,494] of them do not have latitude/longitude data. Please confirm or explain.

[4] Please explain why these 2,818 facilities, or only 17%, do not have latitude/longitude data available.

[5] Please provide a similar document showing driving distances.

[6] Please advise what categories or information, if any, were redacted in the public document.

[h] Please refer to Document #9 containing 5 pages.

[1] This Document indicates that the Library Reference consists of EXCEL spreadsheets while the Commission filing consists of PDF files only. Please provide EXCEL documents and explain any differences between the EXCEL and PDF versions.

[2] Please advise the format of the latitude/longitude data. For example, is it expressed in degrees, minutes, and seconds or is it expressed in whole and decimal parts of a degree? How many decimal places, if any, are utilized? Please provide a sample latitude and a sample longitude entry.

[3] Are the latitude/longitude data expressed in the North American Datum 1983 [NAD 83]? If not, why not?

[4] It appears that this Document was prepared specifically for Library Reference 4. Please confirm or explain.

[5] Please provide all explanations that are contained in Library Reference NP1 in the format that they appear in that Library Reference with redactions if necessary. The justification for each redaction should be indicated.